

Date: March 29, 2004

To: Federal Communications Commission

From: Michael O. Eckert, Managing Director, Qualitone Hearing Instruments

Ref: WT Docket No. 01-309

Qualitone, a hearing aid manufacturer is hereby submitting this filing in response to the FCC's public notice, DA 04-567, inviting comments on petitions for reconsideration of the Report and Order, FCC 03-168, released August 14, 2003, adopting rules for compatibility between hearing aids and wireless telephone handsets.

Specifically, the FCC is seeking a second round of comments on petitions for reconsideration of the hearing aid compatible telephones Report and Order published on August 14, 2003. These petitions are challenging the FCC's decision, issued in July 2003, requiring cellular telephone manufacturers and service providers to take steps to reduce the amount of interference emitted from digital wireless phones and to provide the internal capability for telecoil coupling.

As a hearing aid manufacturer, Qualitone strenuously objects to any efforts to change the FCC's decision regarding the utilization of the ANSI C63.19 standard to measure digital wireless phone compatibility with hearing aids. Qualitone currently utilizes the ANSI C63.19 standard, and it has proven to be a reliable and practical testing method. Furthermore, the ANSI C63.19 test is an approved ANSI standard that we have found to be repeatable, predictable and accurate.

The review and approval process to establish an ANSI standard is rigorous, and we have seen nothing to indicate that the ANSI C63.19 test method is inappropriate for measuring hearing aid and wireless phone compatibility. We are already working to ensure that our hearing aids achieve at least a U2 rating under the ANSI C63.19 test that predicts compatibility with the U3-rated handsets that telephone manufacturers are required by the new rules to produce.

Qualitone is confident that we can provide hearing aids to consumers that will achieve a U2 rating. We are also confident that users will be able to select one of our products and a cellular phone with an understanding that they will not face problems related to interference or will be able to resolve such problems if they occur.

We urge you **not** to reconsider your Report and Order, FCC 03-168.

Thank you.

Michael O. Eckert  
Managing Director  
Qualitone Hearing Instruments